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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DIAMOND RESORTS U.S. COLLECTION  
DEVELOPMENT, LLC, a Delaware limited  
liability company,

Plaintiff,

vs.

REED HEIN & ASSOCIATES, LLC d/b/a/  
TIMESHARE EXIT TEAM, a Washington  
limited liability company; BRANDON REED,  
an individual and citizen of the State of  
Washington; TREVOR HEIN, an individual  
and citizen of Canada; THOMAS  
PARENTEAU, an individual and citizen of the  
State of Washington; HAPPY HOUR MEDIA  
GROUP, LLC, a Washington limited liability  
company; MITCHELL R. SUSSMAN &  
ASSOCIATES, an individual and citizen of  
the State of California; SCHROETER,  
GOLDMARK & BENDER, P.S., a  
Washington professional services  
corporation; and KEN B. PRIVETT, ESQ., a  
citizen of the State of Oklahoma,

Defendants.

CASE NO.: 2:17-cv-03007-APG-VCF

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE RESPONSE  
TO PLAINTIFF'S OBJECTIONS TO  
MAGISTRATE JUDGE'S ORDER (ECF  
342, ECF 353 & ECF 355) [ECF NO.  
364]**

**(Second Request)**

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**STIPULATION AND ORDER TO EXTEND TIME TO FILE RESPONSE TO  
PLAINTIFF'S OBJECTIONS TO MAGISTRATE JUDGE'S ORDER  
(ECF 342, ECF 353 & ECF 355) [ECF NO. 364]**

Pursuant to Local Rule 7-1, Plaintiff DIAMOND RESORTS U.S. COLLECTION DEVELOPMENT, LLC ("Plaintiff") and Defendant SCHROETER, GOLDMARK & BENDER, P.S. ("SGB"), by and through their respective counsel, agree and stipulate as follows:

1. On December 18, 2020, Plaintiff filed Objections to Magistrate Judge's Order (ECF 342, ECF 353 & ECF 355) [ECF No. 364] ("Plaintiff's Objections"). The deadline for Defendants to respond to Plaintiff's Objections was January 4, 2021.

2. The Parties initially stipulated that SGB's deadline to respond to Plaintiff's Objections would be extended to Tuesday, January 19, 2021. ECF No. 366.

3. Recently, a dispute has arisen between Plaintiff and SGB regarding Exhibit 2 to Plaintiff's Objections.

4. The Parties are in the process of meeting and conferring on this issue, however, Plaintiff's counsel will be undergoing an unexpected medical procedure on Monday, January 18, 2021, and discussions have not yet concluded.

5. The Parties therefore agree and stipulate that the deadline for SGB to respond to Plaintiff's Objections, ECF No. 364, shall be extended to Monday, January 25, 2021.

6. Pursuant to Local Rule 6-1(b), the Parties state the reason for the extension is the need to continue to meet and confer regarding Exhibit 2 prior to SGB filing a response to the Objection. The Parties further desire to provide Plaintiff's counsel with adequate time to recover from his unexpected medical procedure without unnecessary pressures arising from the meet and confer process.

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7. The Parties have entered into this agreement in good faith and not for purposes of delay. This is the Parties' second stipulation for extension of this deadline. This request will not cause any prejudice to the parties in this matter.

Dated this 17<sup>th</sup> day of January, 2021.

Dated this 17<sup>th</sup> day of January, 2021.

**GREENSPOON MARDER LLP**

**LIPSON NEILSON P.C.**

*/s/ Phillip A. Silvestri*

*/s/ Megan H. Hummel*

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**IT IS SO ORDERED.**



UNITED STATES DISTRICT JUDGE

DATED: February 10, 2021